



# Compliance and Ethics

## Ethics Program

### Our Management Approach

- Maintain a workplace with a high standard of ethics that is free from discrimination and harassment
- Our [Business Conduct Governance Policy \(BCG\)](#) documents our strong stance on compliance and ethics
- Ensure our employees are aware of how they can voice their concerns on ethical matters
- Employee awareness is heightened through Ethics Awareness Centers at each of our sites which provides Ethics Wallet Cards and Ethics Hotline information which is a grievance mechanism available to all employees
- Promote open communication within the ethics program, ensure that all incidents of misconduct are investigated and actions taken without delay

## Labour and Ethics Management

### Our Management Approach

- Set objectives and targets in the first quarter of each year and track our performance throughout the year
- Develop measurements to track our progress and make continuous improvements
- Develop action plans for risks identified in the risk assessment. If targets are not met, the site Human Resources manager, in partnership with the site Leadership team who manages the assessment report until resolved
- Execute our Labour and Ethics Management System
- Monitor labour conditions at each of our sites
- Conduct internal audits and site-level risk assessments
- Review labour and ethics actions and status at management review meetings
- Revise programs to make improvements based on feedback from site leads and stakeholders

## Supplier Assessments and Verification Visits

### Our Management Approach

- Comply with industry standards to ensure working conditions in the supply chain are safe
- Ensure workers are treated with respect and dignity
- Ensure manufacturing processes are environmentally responsible
- Assess and monitor key suppliers through risk assessment tools, in compliance with the RBA on a regular cadence
- Track and support suppliers in improving assessment scoring upon completed assessments
- Score key direct suppliers on environmental, social, and ethical activities in their operations and make operational business decisions from results

## Ethical Sourcing

### Our Management Approach

- File an annual conflict minerals report to the Securities and Exchange Commission (SEC)
- Complete the [Conflict Minerals Reporting Template](#) provided by the Responsible Minerals Initiative (RMI), formerly the Conflict-Free Sourcing Initiative (CFSI)
- Ensure proper implementation of Celestica's [Conflict Minerals Policy](#)
- Identify new smelters and refiners which may require audits using a Celestica standardized template
- Assist customers to comply with Restriction of Hazardous Substances (RoHS) and Waste Electrical and Electronic Equipment (WEEE) directives
- Manage and identify goods that must comply with a RoHS directive
- Maintain policies for environmental requirements for purchased components, chemicals, and consumables used by Celestica